

REMARKS

INTRODUCTION:

Claim 22 is added herein. Claims 1-22 are pending and under consideration.

REJECTION UNDER 35 U.S.C. §103:

Claims 1-21 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent 5,603,853 to Mombo-Caristan.

Using independent claim 1 as an example, this claim recites "a servomotor is used as a driving source for moving said roller to press said roller on said plate portion in the plate thickness direction." Thus, the servomotor presses the roller in the plate thickness direction.

As noted by the Examiner in the Office Action, Mombo-Caristan states that "one or more rolls can be driven to urge the sheet toward the laser gun assembly 72." Mombo-Caristan, col. 15, ln. 16-17. Thus, the rollers are driven rotationally, but are not pressed in a plate thickness direction.

New claim 22 is added and recites that the servomotor moves the roller linearly, thus further distinguishing over the rotational driving of this reference.

In the Office Action, the Examiner admits that the cited reference does not teach a servomotor, but instead states that a servomotor is an obvious substitution. Applicants respectfully disagree.

As set forth in the present Specification, not all structures to drive rollers in the plate thickness direction are equivalent. For example, coil springs and air cylinders have been used as driving mechanisms. Present Specification, page 2. However, these devices have disadvantages which are overcome by the use of servomotors. Namely, these devices cannot achieve easy control of position, speed and pressing force of the roller, and optimization of pressing force to a plate portion of workpieces of different sizes and shapes. Thus, the use of a servomotor is not an obvious substitution of an equivalent structure, but is not obvious because of the advantages realized.

In the Advisory Action, the Examiner states that the "upper and lower roller bear against

the respective surfaces." The Examiner appears to be referring to column 15, lines 62-64 of the reference, which discusses FIG. 9C therein. However, there is no disclosure that a servomotor "bears" the rollers against the sheet, and the Examiner does not establish that this is the case. Instead, it is only disclosed that the rollers are driven rotationally (by some undisclosed unit), however, there is no disclosure that this same unit drives the rollers against the sheet. Thus, something other than the driving unit may press the rollers against the sheet.

Accordingly, withdrawal of the rejection is requested.

CONCLUSION:

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

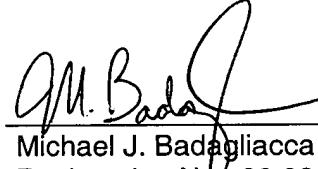
Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this response, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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